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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

ANDREW J. KORNECKI, Individually) No. 2:20-cv-10084-KM-JBC
and on Behalf of All Others Similarly)
Situated,) CLASS ACTION
Plaintiff,) STIPULATION AND ORDER
vs.) STAYING CASE AND
AIRBUS SE, et al.,) SETTING SCHEDULE
Defendants.)

)

Lead Plaintiff Operating Engineers Construction Industry and Miscellaneous Pension Fund (“Pension Fund,” “Plaintiff,” or “Lead Plaintiff”) and Defendants Airbus SE (“Airbus SE”), Guillaume M.J.D. Faury, Tom Enders, Dominik Asam, and Harald Wilhelm (“Defendants” and together with Lead Plaintiff, the “Parties”), by and through their undersigned counsel, agree and jointly propose this stipulation:

WHEREAS, on August 6, 2020, Andrew J. Kornecki filed the initial complaint (“Complaint”) in this action on behalf of persons or entities who purchased or otherwise acquired Airbus SE securities in the United States between February 24, 2016, and July 30, 2020 (“Class”);

WHEREAS, Pension Fund was appointed Lead Plaintiff by the Court pursuant to the Private Securities Litigation Reform Act of 1995 to represent the Class;

WHEREAS, all Defendants have either been served with the Complaint or have agreed to accept or otherwise waive service of the Complaint;

WHEREAS, the Parties have engaged in good faith in an attempt to resolve this matter, and have reached an agreement to settle the matter, subject to appropriate approvals and documentation;

WHEREAS, the Parties have already begun preparation of the formal stipulation of settlement, which will be submitted to the Court together with a motion seeking preliminary approval of the settlement pursuant to Rule 23(e) of the Federal Rules of Civil Procedure on or before May 13, 2022; and

WHEREAS, the Parties hereby request that the Court stay all proceedings or otherwise hold all pending deadlines in abeyance to allow the Parties to finalize the settlement documentation and file a motion seeking the Court's preliminary approval of the settlement under Rule 23(e).

IT IS HEREBY STIPULATED AND AGREED as follows:

1. The matter is stayed; and
2. Lead Plaintiff shall file a motion seeking preliminary approval of the settlement pursuant to Rule 23(e) of the Federal Rules of Civil Procedure on or before May 13, 2022.

DATED: April 1, 2022

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Lead Counsel for Lead Plaintiff

DATED: April 1, 2022

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DATED: April 1, 2022

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SO ORDERED.

s/ Kevin McNulty
Hon. Kevin McNulty
U.S. District Judge
Date: 4/4/2022

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